REMARKS/ARGUMENTS

Reconsideration of this application is respectfully requested.

The abstract, specification and claims have been reviewed and amended above so as to put them in more traditional U.S. format.

As will also be noted, the limitations of claims 12 and 34 have been put into corresponding independent claims and these claims have therefore now been cancelled as redundant.

The rejection of claims 1-47 under 35 U.S.C. §102 as allegedly anticipated by Coffman '174 is respectfully traversed.

Claim 1, as amended, sets out unique features of the "first store" including updating of the store. This store corresponds to the "modality store" of the specification.

Coffman describes a "conversational computing system" that appears to comprise a number of storage means. However, none of these storage means are described in any detail. By way of example, Coffman refers to a transaction history store (paragraph 64), registration tables (paragraph 93), command registry class store (paragraph 119) and registration registry class store (paragraph 120). However, none of these identified storage means is described as a storage means for properties of input and output ports.

With regard to the "first store" of claim 1, the Examiner directs attention to Coffman at paragraph 60. The Examiner's intention here is not clear. No reference to a storage means can be found in this paragraph. It is assumed that the Examiner's argument might be that reference in this paragraph of Coffman to "data" implies the presence of a store for that data, however the Examiner is requested to clarify if this is not the case.

Turning to claim 1, the first store is characterized both in terms of the data it stores and also (as amended) in terms of updating the store.

Considering, first, the data stored, claim 1 is clearly limited to require storage of two sets of data: data specific to the ports and data specific to inputs and outputs communicated through the ports.

Coffman does not refer to such data. In paragraph 60, Coffman refers to: "a mechanism for conveying application properties". These application properties are distinct from applicant's port specific data. Coffman goes on to specify, also in paragraph 60, that these properties include resources the application needs and gives the following examples: engine resources, data files and an algorithm string for input processing. Hence, Coffman teaches the provision of data for specifying processing such as speech recognition + NLU (natural language understanding). The data referred to in Coffman is distinct from the data for which the first store of claim 1 is provided and which is effective in port and mode selection.

The present inventor has realized the importance of providing a store for data specific to ports and the inputs and outputs passed through the ports. There is no clear indication in Coffman of this kind of data being processed, let alone being stored. It may be argued that, having the benefit of the teaching of the present application, a skilled reader could identify the data described at paragraph 60 of Coffman as being the feature that closest resembles the data of claim 1, however, it would be clear to the skilled reader that it is provided for a fundamentally different purpose: that of determining the mechanics of processing (e.g. speech recognition) the signals received and to be transmitted.

The invention of claim 1 is further distinguished from Coffman by providing a level of flexibility not evident in the system of Coffman and realized through dynamic port and message

data. Claim 1 (as currently amended) requires input and output type data to be updated - changing after each response from the user. The first store is arranged to be dynamically updated following each response so that the values may change rapidly from one event to the next. Advantageously, this updating can be used to ensure that each output is provided either on all of the modalities currently available or on all of the modalities currently acceptable to the user (if fewer). Advantageously, this updating can also be used ensure input from the user is accepted despite unpredictable changes in the communication modalities selected by the user. This enables a user to interact in a flexible and intuitive way via a complex of modes: both for input and output thus providing for a richer communications experience.

The ability of the present invention to update the input and output type data to track a series of mode changes encountered in operation brings significant advantages over Coffman. As demonstrated above, this capability is not provided by the system of Coffman. No facility is described in Coffman for changing modes of input/output ports directly as a result of the occurrence of an input or output.

It follows that Coffman does not require a store in the same sense as the first store of claim 1 for storing input and output type data which can be dynamically updated following every response. Furthermore, Coffman provides a self-contained system with no indication that would lead the skilled reader to modify the arrangement set out there so as to arrive at the arrangement of claim 1.

As will be noted, the same deficiencies of Coffman are present for all other independent claims. Accordingly, given this fundamental deficiency of Coffman with respect to at least these features of the independent claims, it is not believed necessary at this time to discuss additional deficiencies of Coffman with respect to other features of the independent claims or other features

added by the rejected dependent claims. Suffice it to note that, as a matter of law, it is impossible for a reference to anticipate any claim unless it teaches each and every feature of that claim.

Accordingly, this entire application is now believed to be in allowable condition and a formal notice to that effect is respectfully solicited.

Respectfully submitted,

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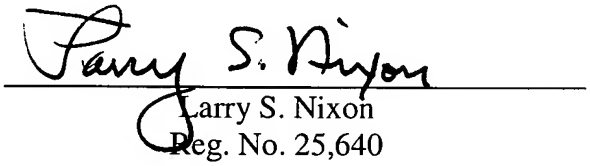
By: 

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